

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

LEGACY PRODUCTIONS LTD.,

Plaintiff,

v.

U2 HOME ENTERTAINMENT, INC et  
al.,

Defendants.

Case No. 09-01822-RAJ

COMBINED JOINT STATUS  
REPORT AND DISCOVERY  
PLAN (FRCP 26(F) AND CR 16)

The Parties to the case provide the following summary pursuant to the Order of January 4, 2010, as later modified by the Court on March 1, 2010. All statements are agreed unless otherwise stated.

**1. Nature and complexity of the case**

This is a straightforward copyright infringement case concerning allegedly unauthorized distribution of the film "Bruce Lee's Jeet Kune Do." The case also includes associated claims for falsification of copyright management information, removal of copyright management information, and trademark infringement.

Combined Joint Status Report and Discovery  
Plan (FRCP 26(f) and CR 16)  
Case No. 09-01822-RAJ

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1 **2. ADR methods**

2 The Parties will employ CR 39.1 mediation.

3 **3. Timing of ADR**

4 Mediation should take place no later than the close of discovery.

5 **4. Deadline for joining additional parties**

6 June 29, 2010.

7 **5. Proposed discovery plan**

8 *a. Dates of Rule 26(f) Conference and Initial Disclosures.*

9 The FRCP 26(f) conference took place via telephone on April 5, 2010. The Parties  
10 have agreed to extend the deadline for FRCP 26(a) initial disclosures to April 30, 2010.

11 *b. Discovery*

12 The Parties anticipate discovery of the details of the creation and use by the Parties of  
13 the film "Bruce Lee's Jeet Kune Do." Discovery should not be conducted in phases or be  
14 limited to or focused on particular issues.

15 *c. Special limitations on discovery*

16 None.

17 *d. Management of discovery for economy*

18 The Parties have exchanged documents informally and expect to continue to do so. The  
19 Parties also agree to accept service by email of documents no longer than 50 pages.

20 *e. Other*

21 Defendant expects a protective order may be needed to shield confidential and  
22 proprietary information.

1 **6. Date for completion of discovery**

2 September 30, 2010.

3 **7. Referral to a Magistrate Judge**

4 Not applicable.

5 **8. Bifurcation**

6 No.

7 **9. Dispensing with pretrial statements and orders**

8 No.

9 **10. Additional suggestions for shortening or simplifying**

10 None.

11 **11. Date the case will be ready for trial**

12 February 2011.

13 **12. Jury**

14 Plaintiff has demanded a jury trial.

15 **13. Number of trial days**

16 Four (4).

17 **14. Trial Counsel**

18 *a. For Plaintiff*

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20 Eric S. Meltzer  
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2 ***b. For Defendant***

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11 **15. Service dates for additional parties**

12 Not applicable.

13 **16. Scheduling conference prior to a scheduling order being entered**

14 Neither party requests one.

15 Signature page follows.

1 Dated this 13<sup>th</sup> day of April, 2010.

2 /s/ Eric S. Meltzer

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